

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JAMES FLETCHER JR.,

Plaintiff,

v.

JEROME BOGUCKI, ANTHONY
NORADIN, RAYMOND SCHALK,
ANTHONY WOJCIK, UNKNOWN CITY
OF CHICAGO POLICE OFFICERS, and the
CITY OF CHICAGO

Defendants.

Case No. 20-cv-04768

Judge Andrea Wood

Magistrate Judge Maria Valdez

JURY TRIAL DEMANDED

JOINT STATUS REPORT

Plaintiff, James Fletcher, and Defendants City of Chicago, Jerome Bogucki, Anthony Noradin, Raymond Schalk, and Anthony Wojcik, by their respective attorneys, and in accordance with the Court's order on September 30, 2021, Dkt. 59, present this joint status report.

I. Status of Discovery

The parties last joint status report was submitted to the court on April 30, 2021, Dkt. 53. Since that report was submitted, this court has adjudicated several pending matters before the Court, including Defendants' joint motion to dismiss and strike certain claims, Dkt. 57, and the parties competing motions for entry of a confidentiality order, Dkt. 55-56. In response to those orders, Defendants have filed supplementary answers to Plaintiff's complaint, *see* Dkt. 62-64, and have produced several rounds of discovery covered by the confidentiality order.

However, there is still outstanding discovery in the case. For example, third-party subpoenas remain outstanding, or have only recently been answered. Furthermore, attorneys for

the Plaintiff and the City have scheduled a meet and confer to discuss the status of document production in the case. Finally, parties have several depositions to complete, most of which depend on documents which have yet to be produced or only recently been received.

Individual Defendants believe there will be at least two discovery disputes that will require the Court's involvement. The first concerns withheld and/or redacted documents produced by the Cook County State's Attorney's Office in response to the Individual Defendants' subpoena. The second concerns the production of Plaintiff's phone calls recorded by the Illinois Department of Corrections. The Individual Defendants are attempting to narrow the scope of the disputes prior to bringing the appropriate motions before the Court.

As such, parties believe that a discovery extension is necessary. The parties will meet and confer on the length of the extension and file a motion for extension of fact discovery shortly.

II. Settlement Efforts and Referral to Magistrate Judge

In accordance with the Court's October 1, 2021 order, Plaintiff tendered a settlement offer on Defendants on November 1, 2021. Defendants' responded with a counter-offer on December 13, 2021. Parties have not yet conferred on the competing demands.

III. Matters in Need of a Telephonic Hearing

None.

Respectfully Submitted,

By: /s/ Mariah Garcia

Arthur Loevy
Jon Loevy
Anand Swaminathan
Mariah Garcia
LOEVY & LOEVY
311 N. Aberdeen, 3rd Floor
Chicago, IL 60607
(312) 243-5900

Jennifer Blagg
1333 W. Devon Ave., Suite 267
Chicago, IL 60660
(773) 859-008

Attorneys for Plaintiff

CELIA MEZA
Corporation Counsel of the City of Chicago

By: /s/ Paul A. Michalik
Special Assistant Corporation Counsel

Terrence M. Burns
Paul A. Michalik
Daniel M. Noland
Reiter Burns LLP
311 S. Wacker Dr., Suite 5200
Chicago, IL 60606
(312) 982-0090
Attorneys for Defendant City of Chicago

By: /s/ Brian Stefanich
Special Assistant Corporation Counsel

Andrew Hale
Barret Boudreaux
Brian Stefanich
Allyson West
Hale & Monico
53 W. Jackson Blvd., Suite 330
Chicago, IL 60604
(312) 870-6908
Attorneys for the Individual Defendant

CERTIFICATE OF SERVICE

I hereby certify that on **December 17, 2021** I caused the foregoing **Joint Status Report** with the Clerk of the Court using the ECF system, which sent electronic notification of the filing on the same day to all counsel of record via the Court's CM/ECF system.

/s/ Mariah Garcia
Attorney for Plaintiff